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10 UNITED STATES BANKRUPTCY COURT  
11 DISTRICT OF NEVADA

12 In re  
13 IRMA MERCADO,  
14 Debtor(s).

Bankruptcy Case No. BK-S-09-22334-MKN  
Chapter 13  
FIRST FRANKLIN FINANCIAL CORP 'S  
REQUEST FOR SPECIAL NOTICE AND  
SERVICE OF PAPERS AND  
RESERVATION OF RIGHTS

17 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR AND ALL  
18 INTERESTED PARTIES

19 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for FIRST  
20 FRANKLIN FINANCIAL CORP hereby requests special notice of all events relevant to the  
21 above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-  
22 referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy  
23 Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests  
24 for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of  
25 all matters which must be noticed to creditors, creditors committees and parties-in-interest and other  
26 notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the  
27 above-referenced bankruptcy court.  
28

1 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master  
2 Mailing List in this case, the following address be used:

3 Jacque A. Gruber  
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5 P.O. Box 17933  
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6  
7 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,  
8 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a  
9 waiver of the within party's:

10 a. Right to have any and all final orders in any and all non-core matters entered only  
11 after de novo review by a United States District Court Judge;

12 b. Right to trial by jury in any proceeding as to any and all matters so triable herein,  
13 whether or not the same be designated legal or private rights, or in any case, controversy or  
14 proceeding related hereto, notwithstanding the designation or not of such matters as "core  
15 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant  
16 to statute or the United States Constitution;

17 c. Right to have the reference of this matter withdrawn by the United States District  
18 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

19 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to  
20 which this party is entitled under any agreements at law or in equity or under the United States  
21 Constitution.

22 All of the above rights are expressly reserved and preserved by this party without  
23 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing  
24 or by any other participation in these matters.

25 Dated: September 28, 2009

/s/ Jacque A. Gruber  
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